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BEFORE THE ARIZONA CORPORATION COMMISSION

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Commissioner

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Commissioner

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Commissioner

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DOCKET CONTROL

Arizona Corporation Commission

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COMMISSION INQUIRY INTO  
POSSIBLE MODIFICATION OF THE  
COMMISSION'S HOLDING  
COMPANIES AND AFFILIATED  
INTEREST RULES, A.A.C. ARTICLE 8,  
R14-2-801

) DOCKET NO. AU-00000A-15-0246  
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)  
) COMMENTS OF INTEGRA  
)  
)  
)

By its filing made November 16, 2015, the Utilities Division ("Staff") of the Arizona Corporation Commission ("Commission") invited affected telecommunications utilities and interested parties to provide informal written comments regarding changes to A.A.C. R14-2-801, et seq., the Affiliated Interest Rules (the "Rules"). In response, Eschelon Telecom of Arizona, Inc., Electric Lightwave, LLC, and Mountain Telecommunications of Arizona, Inc., all dba Integra Telecom ("Integra") submit the following comments.

Integra supports the proposal to amend the Rules by exempting telecommunications utilities whose retail services are classified as competitive by the Commission. Integra believes the requirements of the Rules are unnecessary for competitive carriers. Indeed, Eschelon Telecom of Arizona, Inc. was granted a limited waiver on April 17, 2002 in Decision No. 64737. Electric Lightwave, LLC and Mountain Telecom of Arizona, Inc. were granted a limited waiver on July 30, 2013 in Decision No. 73999. Although the Integra operating entities have limited waivers of the Rules, Integra believes that a uniform, total exemption of these rules for all

1 carriers classified as competitive providers is both appropriate and equitable and should be  
2 adopted by the Commission.

3  
4 Respectfully submitted,



5 Dated: December 15, 2015.

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7 \_\_\_\_\_  
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15 ORIGINAL and thirteen (13) copies filed  
16 this 15th day of December, 2015, with:

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18 Docket Control  
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